

**To:** Mark Koontz[Mark.Koontz@ci.bremerton.wa.us]  
**From:** Chris Wion  
**Sent:** Wed 12/30/2009 12:49:13 PM  
**Subject:** RE: Bremerton v. Sesko  
[12.30.09 Stipulated Motion to continue trial.doc](#)  
[12.30.09 notice appearance.pdf](#)

Mark,

For your review, I am attaching a draft Stipulated Motion and [Proposed] Order Amending Order Setting Trial Date and Civil Case Event Schedule - based on the motion you sent on Monday. Please let me know if you have any changes.

Also, please let me know if your office could file both the stipulation and our attached Notice of Appearance - which will need to be filed first. If not, we will need to file via FedEx, which will take some additional time.

Thanks.

-Chris

-----Original Message-----

**From:** Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]  
**Sent:** Monday, December 28, 2009 10:53 AM  
**To:** Chris Wion  
**Subject:** RE: Bremerton v. Sesko

That's fine. I didn't realize you were going to be appearing for her this week. Feel free to draft a stip and order and email it over to me. I will be in the office all week.

Mark E. Koontz  
Assistant City Attorney  
City of Bremerton  
345 Sixth Street, Ste. 600  
Bremerton, WA 98337  
360-473-2345  
[mark.koontz@ci.bremerton.wa.us](mailto:mark.koontz@ci.bremerton.wa.us)

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**From:** Chris Wion [mailto:chrisw@dhl.com]  
**Sent:** Monday, December 28, 2009 10:46 AM  
**To:** Mark Koontz  
**Subject:** RE: Bremerton v. Sesko

Mark,

I think there are a few ways to do this, but let me make this suggestion, which should streamline the process. How about we first file our notice of appearance (today or tomorrow) and then we can submit a cursory stipulated motion? Let me know if that works for you. Thanks.

-Chris

-----Original Message-----

**From:** Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]  
**Sent:** Monday, December 28, 2009 10:39 AM  
**To:** Chris Wion  
**Subject:** RE: Bremerton v. Sesko

Here is a copy of the motion. I haven't had my legal assistant proof it yet, so it may have a few typos.

Mark E. Koontz  
Assistant City Attorney  
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360-473-2345  
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**From:** Chris Wion [mailto:chrisw@dhl.com]  
**Sent:** Monday, December 28, 2009 10:29 AM  
**To:** Mark Koontz  
**Subject:** RE: Bremerton v. Sesko

Thanks Mark. We will join in the request for a continuance, but I'd like to see the motion before it is filed. I'll be here all day, so turnaround should be quick.

-Chris

-----Original Message-----

**From:** Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]  
**Sent:** Monday, December 28, 2009 10:26 AM  
**To:** Chris Wion  
**Subject:** RE: Bremerton v. Sesko

Chris,

Thanks for your email. First, the City is not interested in leasing Ms. Sesko's Pennsylvania Way property. I am working on the motion and will have it filed and emailed to you today. I intend to request a new trial date to be set no earlier than November 1, 2010. Please email me whether you join in that request.

-Mark

Mark E. Koontz  
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**From:** Chris Wion [mailto:chrisw@dhl.com]  
**Sent:** Monday, December 28, 2009 8:22 AM  
**To:** Mark Koontz  
**Subject:** Bremerton v. Sesko

Mark,

During our last telephone conference, you indicated that you would (a) investigate whether the City would be interested in leasing Mrs. Sesko's Pennsylvania Way property and (b) prepare a draft motion for trial continuance in the pending action. I understand that the holidays create some timing problems, but please let me know when we should expect to hear back from you on these two items.

Thank you.

-Chris

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